

AB:DR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

CARON PITTER,  
ROHAN LYTTLE.

AFFIDAVIT IN SUPPORT OF  
REMOVAL TO THE  
MIDDLE DISTRICT OF  
PENNSYLVANIA

(Fed R. Crim. P. 5)

Defendants.

Case No. 21-MJ-117

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EASTERN DISTRICT OF NEW YORK, SS:

NATHAN BEREZANSKY, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about January 25, 2021 the United States District Court for the Middle District of Pennsylvania issued an arrest warrant commanding the arrest of defendants CARON PITTER and ROHAN LYTTLE for violations of Title 18, United States Code, Section 1349 (conspiracy to commit wire fraud and mail fraud).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about January 25, 2021, the United States District Court for the Middle District of Pennsylvania issued an arrest warrant commanding the arrest of defendants CARON PITTER and ROHAN LYTTLE for violations of Title 18, United States Code, Section 1349 (conspiracy to commit wire fraud and mail fraud). A true and correct copy of the arrest warrants and criminal complaint are attached hereto as Exhibit A.

**Caron Pitter**

2. On January 28, 2021 at approximately 7:10 a.m., the defendant CARON PITTER was arrested at 7121 Little Neck Parkway in Glenn Oaks, New York, an address retrieved from a law enforcement database as associated with the defendant CARON PITTER.

3. The arrested individual identified herself as "Caron Pitter." The arrested individual was also in possession of a passport under the name of "Caron Pitter." The photograph on the passport matched the likeness of the arrested individual and that of the defendant CARON PITTER sought in the relevant arrest warrant.

4. Based on the foregoing, I submit that there is probable cause to believe that the defendant is the CARON PITTER wanted in the Middle District of Pennsylvania.

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause for removal, I have not described all of the relevant facts and circumstances of which I am aware.

**Rohan Lyttle**

5. On January 28, 2021 at approximately 7:00 a.m., the defendant ROHAN LYTTLE was arrested at 23216 130<sup>th</sup> Avenue in Laurelton, New York, an address retrieved from a law enforcement database as associated with the defendant ROHAN LYTTLE.

6. The arrested individual provided his name as “Rohan Lyttle.” The arresting officers entered the residence and located a wallet that Rohan Lyttle identified as belonging to him. Inside the wallet there was a New York ID in the name of “Rohan Lyttle.” The photograph on the ID matched the likeness of the arrested individual and that of the defendant ROHAN LYTTLE sought in the relevant arrest warrant.

7. Based on the foregoing, I submit that there is probable cause to believe that the defendant is the ROHAN LYTTLE wanted in the Middle District of Pennsylvania.

WHEREFORE, your deponent respectfully requests that the defendants CARON PITTER and ROHAN LYTTLE be removed to the Middle District of Pennsylvania so that they may be dealt with according to law.

*/s/ Nathan Berezansky by CLP*

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NATHAN BEREZANSKY  
Postal Inspector  
United States Postal Inspection Service

Sworn to before me via telephone  
this 28 day of January, 2021

*Cheryl L. Pollak*

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THE HONORABLE CHERYL L. POLLAK  
CHIEF UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

# Exhibit A

# UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America

v.

CARON PITTER,  
ROHAN LYTTLE,  
ROHAN LYTTLE, JR.

)  
)  
)  
)  
)

Case No. 1:21-MJ-00010

*Defendant*

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) CARON PITTER,

who is accused of an offense or violation based on the following document filed with the court:

Indictment     Superseding Indictment     Information     Superseding Information     Complaint  
 Probation Violation Petition     Supervised Release Violation Petition     Violation Notice     Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1349 (conspiracy to commit wire fraud and mail fraud)

Date: 01/25/2021

*Martin C. Carlson* NSB 1/25/2021  
2:43 pm  
Issuing officer's signature

City and state: HARRISBURG, PA

MARTIN C. CARLSON, U.S. MAGISTRATE JUDGE

*Printed name and title*

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

*Arresting officer's signature*

*Printed name and title*

## UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America

v.

CARON PITTER,  
ROHAN LYTTLE,  
ROHAN LYTTLE, JR.

)

Case No. 1:21-MJ-00010

*Defendant*

)

## ARREST WARRANT

To: Any authorized law enforcement officer

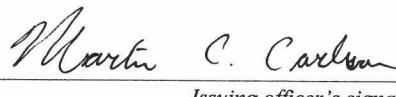
**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) ROHAN LYTTLE,

who is accused of an offense or violation based on the following document filed with the court:

Indictment       Superseding Indictment       Information       Superseding Information       Complaint  
 Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

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 NSEB 1/25/2021  
 2:43 PM

Issuing officer's signature

City and state: HARRISBURG, PA

MARTIN C. CARLSON, U.S. MAGISTRATE JUDGE

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
Middle District of Pennsylvania

United States of America

)

v.

)

CARON PITTER,  
ROHAN LYTTLE, and  
ROHAN LYTTLE, JR.

)

)

)

Case No. 1:21-MJ-00010

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2020 through November 2020 in the county of Cumberland in the  
Middle District of Pennsylvania, the defendant(s) violated:

*Code Section*  
18 U.S.C. Section 1349

*Offense Description*  
Conspiracy to Commit Wire Fraud and Mail Fraud

This criminal complaint is based on these facts:

1. Your Affiant is Nathan Berezansky, a Postal Inspector of the United States Postal Inspection Service, currently assigned to the Harrisburg Domicile of the Philadelphia Division. I have been employed as a United States Postal Inspector for the past four years. I have investigated numerous identity theft, account takeover, and mail fraud schemes, and have received specialized agency training in those subjects. . . .

Continued on the attached sheet.

  
Complainant's signature

NATHAN BEREZANSKY, POSTAL INSPECTOR  
Printed name and title

Sworn to before me and signed in my presence.

Date: 1/25/2021

  
Judge's signature

NSB 1/25/2021  
2:45 pm

City and state: HARRISBURG, PA

MARTIN C. CARLSON, U.S. MAGISTRATE JUDGE  
Printed name and title

**Continuation of AFFIDAVIT**

**Introduction**

1. (Cont.) Michael Hartman, a retired Postal Inspector, is one of the Investigative Support Analysts assigned to my team. Mr. Hartman, a Certified Public Accountant and Certified Fraud Examiner, specialized in the investigation of cross border fraud matters during the past 27 years. Mr. Hartman contributed his knowledge and experience to the investigative findings referenced in this Affidavit.

**Investigative Summary**

2. This affidavit summarizes CARON PITTER's, ROHAN LYTTLE'S, and ROHAN LYTTLE, JR.'S money laundering activity on behalf of a network of Jamaican based telemarketers that obtained money from numerous senior citizens under the false promise of a substantial, but non-existent, sweepstake prize in support of a Criminal Complaint and Warrant for the arrest of Jamaican born New York residents CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. Per United States Immigration records, ROHAN LYTTLE, is a lawful permanent resident, and spouse of CARON PITTER, a United States citizen. ROHAN LYTTLE, JR., a non-United States citizen, is the son of ROHAN LYTTLE and C.M., a Jamaican National. A review of various Delaware and New York Department of State filings and business bank account applications disclosed that ROHAN LYTTLE and CARON PITTER operate, as partners and/or corporate officers, Ro-Cars 75 and Work Hard Motors in the New York borough of Queens. Recent correspondence and a visit by an insurance company representative confirmed that Ro-Cars 75, a reported auto body shop, is located at 170-30 Douglas Avenue, Jamaica, NY, and is operated by ROHAN LYTTLE and CARON PITTER. To date, our investigation has disclosed that three senior citizens, V1, V2 and V3, at the direction of Jamaica based telemarketers, have mailed envelopes containing cash addressed to CARON PITTER and Ro-Cars 75 at three addresses in Queens, including 170-30 Douglas Avenue and the residential address of ROHAN LYTTLE, to satisfy advance fee requirements to receive a non-existent and undelivered cash prize. A fourth senior citizen sweepstakes scam victim, V-4, wired monies to the personal bank account of ROHAN LYTTLE, JR. CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. "flipped" (i.e., promptly forwarded) the fraud proceeds to co-

conspirators in Jamaica and the United States or used the proceeds to purchase automobiles. CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. kept a portion of the fraud proceeds for their personal enrichment.

**Advance Fee Sweepstakes Fraud**

3. Your affiant and ISA Hartman have interviewed numerous victims of advance fee sweepstakes fraud. The typical fraud progresses as follows:

- A fraudulent telemarketer tells the prospective victim that they have been the selected winner of a large sweepstakes prize.
- The winner, however, must first pay an advance fee to defray various expenses in order to receive their prize.
- Typically, the first advance payment is to pre-pay taxes on their purported winnings.
- After the victim makes the first payment, the telemarketer invariably informs the victim that additional advance payments are required for expenses such as insurance, transportation or international customs fees.
- The advance fee requirements are endless, continuing until the victim depletes their life savings or comes to the realization that they have been defrauded.
- The fraudulent telemarketers, particularly Jamaica based telemarketers, originally preferred and directed victims to send Western Union and MoneyGram money transfers to satisfy the advance fee requirements. Western Union and MoneyGram, however, improved their anti-fraud protocols, and the fraudsters have developed additional avenues to receive and launder the proceeds of fraud.
- In this case, the fraudsters directed V1, V2, and V3 to mail cash and cashier's checks to various addresses in the United States. The fraudsters also gained access to the victims' bank and credit card accounts, and either themselves or through direction to the victims, wired monies or purchased merchandise for the enrichment of the co-conspirators.
- The fraudulent telemarketers typically falsely claim that the cash envelope, bank wire and merchandise addressees/beneficiaries are the representatives of legitimate lottery or sweepstakes agencies.
- There are no cash prizes.

**Jamaican Advance Fee Sweepstakes Frauds**

4. ISA Hartman has reviewed consumer fraud complaints submitted by Western Union and MoneyGram senders. Beginning in or about 2006, ISA Hartman noted a spike in advance fee sweepstake fraud complaints from United States citizens, particularly senior citizens, wherein the fraud induced money transfers were paid in Jamaica. During the period 2006 through 2012, Western Union and MoneyGram senders reported that they sent 52,279 money transfers totaling more than \$27 million to Jamaica that were reported as fraud induced. In consultation with industry and regulatory experts, ISA Hartman learned that 10%, or less, of those victimized actually reported their victimization. Since 2013, MoneyGram and Western Union have calculated both reported and linked fraud activity. Since 2013, United States residents have sent more than \$250 million to Jamaica via MoneyGram and Western Union, alone, as either victims or money mules that can be associated with mass marketing fraud activity. During the past five (5) years ISA Hartman has interviewed numerous Western Union and MoneyGram Anti-Fraud and Anti Money Laundering professionals concerning the proliferation of Jamaica based advance fee sweepstakes fraud and money laundering activity. Based on these interviews, our review of Western Union and MoneyGram activity, and numerous interviews with victims of Jamaica based advance fee sweepstakes activity we have determined the following:

- During the period 2006 – 2012, Jamaica based telemarketers invariably directed victims to send Western Union and MoneyGram money transfers directly to Jamaica to satisfy the advance fee conditions.
- Beginning in or about 2012, following interdiction efforts led by a partnership among United States and Jamaica law enforcement, the Jamaica based fraudsters developed alternative means to receive fraud proceeds in Jamaica from United States victims.
- The fraudulent telemarketers recruited middlemen, sometimes referred to as money mules, to receive fraud proceeds via domestic couriers, money service businesses (MoneyGram, Western Union, Zelle and others), and bank wires in the United States, and then flip the money to fraudsters in Jamaica.

- In some instances, the fraudsters recruit victims to receive and flip, knowingly and unknowingly, the proceeds of advance fee sweepstakes fraud activity.
- The typical victim turned money mule is led to believe that their receipt and redistribution of monies is legitimate and will lead to their receipt of a long-promised cash prize.
- The non-victim money mules typically keep a percentage of the fraud proceeds for their role in the fraud and money laundering activity.

**Victim interviews**

5. Your affiant and ISA Hartman have interviewed several victims of the Jamaica based advance fee sweepstakes fraud and money laundering activity detailed in this affidavit. Each of the victims mailed cash or money orders, and/or wired their payments to a receiver or payee in the United States. One of the victims, V1, age 77, a resident of Cumberland County, told your affiant that in or about May 2020, V1 was contacted by telephone by an individual that identified himself as Andrew Goldberg, a representative of Publishers Clearing House (PCH). Goldberg told V1 that V1 was the lucky recipient of a \$2.5 million PCH cash prize. Goldberg told V1 that V1 had to pre-pay taxes in order to receive the cash prize. V1 told your affiant that during the period May 2020 through November 2020, V1 has received multiple explanations for non-receipt of the cash prize, and the continued need to send additional payments for taxes, insurance, and transportation fees. V1 told your affiant that Goldberg increased V1's winnings to \$5 million and then again to \$15 million and a 2020 Land Rover. V1 told your affiant that V1 has sent more than \$700,000, cash, to satisfy the advance fee conditions. Additionally, V1 told your affiant that Goldberg convinced V1 to permit Goldberg, using virtual desktop software, repeated and unsupervised access to V1's computer, bank, and credit card accounts, including V1's Amazon Prime account. V1 told your affiant that V1 never received the promised cash prize.

6. Your affiant and ISA Hartman, with the cooperation of V1 and V1's son, have recovered bank records from V1's original bank account and the two additional bank accounts opened by V1 at the direction of Goldberg. V1 told your affiant that V1 nearly depleted V1's life savings and retirement accounts at Goldberg's direction. Our review

disclosed that during the period May 28, 2020 through August 26, 2020, V1 completed 61 cash withdrawals totaling \$728,300 at Goldberg's direction. V1 told your affiant that Goldberg directed V1 to mail the cash via Federal Express, United Parcel Service and the United States Postal Service to various individuals and entities in the states of Florida, Georgia, New Jersey, and New York. V1 told your affiant that Goldberg told him that each addressee was a representative of PCH or an agency authorized to collect taxes, insurance, or transportation fees associated with V1's cash and automobile prizes. Your affiant and ISA Hartman recovered receipts, invoices, and statements from Federal Express, UPS, and the USPS which document V1's cash mailings. Our review disclosed that V1 mailed 18 envelopes containing cash to addresses in Florida, Georgia, New Jersey, and New York. Your affiant and ISA Hartman have confirmed that seven (7) of the 18 envelopes were delivered to addresses associated with CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR., detailed below. Your affiant and ISA Hartman confirmed that on the day of or the day preceding each mailing V1 withdrew a total of \$175,000 from V1's bank accounts.

Send Date	Addressee	Address	City	State	Zip Code	Signed For
6/3/2020	Caren Pitter	185 Nassau Blvd	West Hempstead	NY	11552	
6/5/2020	Caron Pitter	185 Nassau Blvd	West Hempstead	NY	11552	Karen
6/9/2020	Rocars Auto	17030 Douglas Avenue	Jamaica	NY	1433	
6/10/2020	Rocars Auto	23216 130th Avenue	Jamaica	NY	11433	Rohan
6/12/2020	Rocars Auto	17030 Douglas Avenue	Queens	NY	11413	
8/6/2020	Rocars Auto	17030 Douglas Avenue	Jamaica	NY	11433	Trevor
9/9/2020	Rocal Auto	17030 Douglas Avenue	Jamaica	NY	11433	Trevor

- V1 told your affiant that Goldberg directed V1 to purchase auto parts, reportedly to repair the Land Rover V1 won. As directed, V1 purchased the auto parts from Jaguar

Land Rover Harrisburg in Cumberland County, PA, and charged the \$15,562.17 purchase to two of V1's credit card accounts. The Jaguar Land Rover Harrisburg Parts Department furnished documentation that the parts were shipped via ABF Freight addressed to Ro-Car Auto, 170-30 Douglas Avenue, Jamaica, NY. An ABF Freight Security Official and ABF Manifest confirmed delivery of the auto parts to Ro-Car Auto at 170-30 Douglas Avenue, Jamaica, NY on July 7, 2020. The ABF Manifest appears to have been signed by ROHAN LYTTLE, Customer.

8. V1 told your affiant that at Goldberg's direction, V1 wired \$2,000 and \$6,000 on June 15 and July 9, 2020, respectively, from V1's Santander Bank account payable to R.S. at TD Bank, Florida. A TD Bank Fraud Investigator told your affiant that the proceeds of the wires totaling \$8,000 were credited to the account of a Jamaican National, and the proceeds of the V1 bank wires were withdrawn in Jamaica. V1 told your affiant that at Goldberg's direction, V1 wired \$1,000 from V1's Citizens Bank account payable to a beneficiary in a remote state that your affiant and ISA Hartman would later identify as V2.

9. Based on our review of Federal Express documentation reflecting confirmed deliveries to Ro-Cars at 170-30 Douglas Avenue, Jamaica, NY, your affiant and ISA Hartman identified V2, age 72, the recipient of V1's June 15, 2020, \$1,000 bank wire, as a Federal Express sender and potential victim of Jamaica based advance fee sweepstakes activity. Your affiant and ISA Hartman interviewed V2. V2 told your affiant and ISA Hartman that during April 2020, V2 was told by Andrew Goldberg, a representative of PCH, that V2 had won a million-dollar PCH cash prize. V2 told your affiant and ISA Hartman that over the next several months Goldberg directed V2 to mail cash and checks to multiple individuals and entities totaling approximately \$120,000. V2 reported that on May 19, 2020 and July 29, 2020, at Goldberg's direction, V2 mailed \$15,000 and \$4,500 cash, respectively, addressed to Ro-Cars Auto, detailed below. V2 told your affiant and ISA Hartman that at the direction of Goldberg, V2 sent six (6) \$9,000 checks payable to an individual your affiant and ISA Hartman have identified as V4. V2 told your affiant and ISA Hartman that Goldberg arranged V1's \$1,000 bank wire credited to V2's account to fund additional V2 payments necessary to receive the cash prize. V2 further reported that Goldberg gained access to V2's credit card

accounts and facilitated debits and credits that the bank later reported as fraudulent. V2 stated that V2 has never received the promised cash prize.

Send Date	Addressee	Address	City	State	Zip Code	Signed For
05/19/2020	Rocars Auto	170-30 Douglas Avenue	Jamaica	NY	11433	Rohan
07/29/2020	Rocars Auto	170-30 Douglas Avenue	Jamaica	NY	11433	Karen

10. Based on our review of Federal Express documentation reflecting confirmed deliveries to Ro-Cars Auto, your affiant and ISA Hartman identified V3, age 67, as a Federal Express sender and potential victim of Jamaica based advance fee sweepstakes scam activity. The confirmed mailings sent by V3 are listed below.

Send Date	Addressee	Address	City	State	Zip Code
6/22/2020	Rocars Auto	23216 130th Avenue	Springfield Gardens	NY	11413
6/24/2020	Rocars Auto	23216 130th Avenue	Springfield Gardens	NY	11413
6/26/2020	Rocars Auto	23216 130th Avenue	Springfield Gardens	NY	11413
6/29/2020	Rocars Auto	23216 130th Avenue	Queens	NY	11413
10/1/2020	Rocars Auto	170-30 Douglas Avenue	Jamaica	NY	11433

11. V3's bank identified V3 as a victim of elder financial exploitation. Your affiant and ISA Hartman recovered documentation from V3's bank. Our review disclosed that during the time period June 22 – June 29, 2020, concurrent with the four Federal Express mailings delivered to Ro-Cars Auto, V3 withdrew a total of \$49,000, cash, on four separate occasions.

12. Your affiant noted that the four V3 mailings were addressed to Ro-Cars at 23216 130<sup>th</sup> Avenue, Springfield Gardens/Queens, NY. An inquiry with United States Immigration officials disclosed that ROHAN LYTTLE and ROHAN LYTTLE, JR. reported to Immigration that they, ROHAN LYTTLE and ROHAN LYTTLE, JR., reside at 23216

130<sup>th</sup> Avenue, Queens, NY. Your affiant and ISA Hartman recovered documentation from JPMorgan Chase Bank (Chase) regarding the Ro Cars aka Ro Cars 75 Inc. Chase bank account. The Chase bank records identify CARON PITTER and ROHAN LYTTLE as Ro-Cars 75 Inc. officers and account signatories. The bank records list the Ro-Cars 75 Inc. business address as 170-30 Douglas Avenue, Jamaica, NY. ROHAN LYTTLE presented identification to Chase which listed his address as 23216 130<sup>th</sup> Avenue, Laurelton, NY. Your affiant and ISA Hartman reviewed Western Union business records that disclosed that CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. reported to Western Union that PITTER, LYTTLE, and LYTTLE, JR. resided at 23216 130<sup>th</sup> Avenue incident to completing money transfers destined for Jamaica. Your affiant notes that Laurelton and Springfield Gardens are adjacent neighborhoods in the borough of Queens, NY, and Laurelton is sometimes listed as Springfield Garden or Queens on items addressed to 23216 130<sup>th</sup> Avenue. On or about May 19, 2020, a \$7,966 Liberty Mutual Insurance automobile settlement check associated with a Ro-Cars' customer was mailed to 23216 130<sup>th</sup> Avenue and deposited to the Chase Ro-Cars account controlled by CARON PITTER and ROHAN LYTTLE. A Liberty Mutual claims examiner told ISA Hartman that he discussed the claim with a Ro-Cars representative who identified herself as "Karen".

13. Your affiant reported in paragraph 9, above, that V2 mailed six (6) \$9,000 checks payable to an individual identified as V4, age 86. Your affiant and ISA Hartman recovered bank records from multiple accounts used by V4 to accept and re-distribute the proceeds of advance fee sweepstakes activity. V4's banks and a local police department have identified V4 as a victim of Elder Financial Exploitation. During the period January 2020 until May 2020, V4 deposited checks from multiple individuals to V4's SunTrust account. V4 used the proceeds to issue official bank checks, including a \$2,000 check payable to ROHAN LYTTLE, and fourteen (14) Zelle money transfers, bank to bank, totaling \$16,500 payable to ROHAN LYTTLE at Bank of America. Your affiant and ISA Hartman recovered documentation of the V4 – ROHAN LYTTLE Zelle money transfers and determined that the money transfers were deposited to ROHAN LYTTLE, JR.'s account at Bank of America.

14. Your affiant and ISA Hartman recovered Bank of America (BOA) records for the ROHAN LYTTLE, JR. account. ROHAN LYTTLE, JR. listed his address as 23216 130<sup>th</sup> Avenue, Springfield Gardens, NY, his date of birth as November 5, 1997, and his occupation as mechanic when he opened the subject BOA account. Our review of LYTTLE, JR.'s BOA account disclosed that LYTTLE, JR. received 26 Zelle money transfers totaling \$22,515 from five (5) individuals, including V4. Among the five (5) senders was LYTTLE, JR.'s biological mother, C.M. C.M. was listed as the sender for eight (8) Zelle money transfers totaling \$3,080 deposited to LYTTLE, JR.'s account. LYTTLE, JR. utilized the BOA account to send 39 Zelle money transfers totaling \$34,498 payable to eight (8) individuals including C.M. and CARON PITTER. During the time period LYTTLE, JR. received Zelle money transfers totaling \$16,500 from V4, February – April 2020, LYTTLE, JR. sent 12 Zelle money transfers totaling \$16,250 payable to CARON PITTER (\$10,750) and C.M. (\$5,500). Also, during this period ROHAN LYTTLE, JR.'s BOA account was credited with four (4) remote deposits totaling \$17,750 completed in Georgia, Florida, Michigan, and New York. The Zelle money transfers and remote state deposits are consistent with advance fee scam and money laundering activity. In addition to V4, Bank of America confirmed after the fact that an individual that completed a remote state deposit to LYTTLE, JR.'s account reported to BOA that they were a sweepstakes fraud victim.

15. Your affiant and ISA Hartman recovered and reviewed Chase bank records for the Ro-Cars 75 Inc. (Ro-Cars) business account and CARON PITTER'S personal account. The Ro-Cars business account was opened by CARON PITTER, the reported Ro-Cars Secretary, on February 3, 2016. ROHAN LYTTLE was added as an authorized signatory on April 18, 2016, and in or about March 2019, CARON PITTER reported the Ro-Cars business address as 170-30 Douglas Avenue. A review of Ro-Cars incoming bank wires disclosed that on or about November 20, 2017, November 22, 2017 and December 4, 2017, the Chase Ro-Cars' account was credited with three (3) incoming bank wires totaling \$16,500 from an individual later identified as V5, age 84. Your affiant and ISA Hartman have reviewed V5's bank and money transfer activity and confirmed that V5 has conducted financial transactions with confirmed fraudsters and money mules in the United States and Jamaica.

16. Your affiant's and ISA Hartman's reviewed CARON PITTER's personal Chase bank account. During the period May 2020 through November 2020, PITTER's personal account has been credited with deposits totaling \$74,803, including ATM cash deposits totaling \$33,305 and incoming money transfers, primarily Zelle money transfers, totaling \$29,577. Please note that this May 2020 – November 2020 analysis does not include the ROHAN LYTTLE, JR. Zelle money transfers totaling \$16,500 credited to PITTER's account during February – April 2020. The monies deposited to PITTER's personal bank account, by source, type and amount, are not consistent with PITTER's weekly Ro-Cars 75 salary, or the modest revenue realized by Ro-Cars 75.

17. In addition to the cash totaling \$33,305 deposited to PITTER's personal account, PITTER completed the below listed cash transactions totaling \$184,411 associated with PITTER's personal account, and bank accounts in the names Work Hard Motors and Ro-Cars 75, each co-owned with ROHAN LYTTLE, and a Florida account in the name Extreme Automotive Services. CARON PITTER's association with Extreme Automotive Services is presently unknown. In addition to the suspect source of funds transactions depicted below, CARON PITTER and ROHAN LYTTLE purchased cashier's checks totaling \$89,281 payable to Insurance Auto Auction and Copart with funds drawn from PITTER's account, (\$19,825) and the Ro-Cars 75 account (\$69,456). Copart is a global provider of online vehicle auction and remarketing services to automotive resellers such as insurance, rental car, fleet and finance companies. During the period May 2020 through November 2020, CARON PITTER (\$45,013), Ro-Cars 75 (\$87,600), Work Hard Motors (\$21,700) and Extreme Automotive (\$238,418) purchased cashier's checks totaling \$392,730 payable to Insurance Auto Auctions and Copart.

CARON PITTER Large Cash Transactions			
Date	Amount	Bank	Associated Account
5/14/2020	\$12,250	Chase	Ro-Cars 75 and CARON PITTER
6/10/2020	\$28,970	Chase	Ro-Cars 75 and CARON PITTER
6/15/2020	\$21,000	Chase	CARON PITTER
6/16/2020	\$21,540	Chase	CARON PITTER Ro-Cars 75 and CARON
6/26/2020	\$20,000	Chase	PITTER Extreme Automotive Services
7/7/2020	\$36,000	Chase	Ro-Cars 75 and CARON
8/11/2020	\$22,821	Chase	PITTER Work Hard Motors and
8/14/2020	\$21,830	TD Bank	CARON PITTER
<b>Total</b>	<b>\$184,411</b>		

18. On March 3, 2020, at Baltimore, Maryland, PITTER's personal account was credited with a \$6,396 deposit consisting of eleven (11) MoneyGram and Western Union money orders. The purchaser of the money orders was unidentified, but the purchaser's address was listed as 6310 Greenspring Avenue, Apartment 104, Baltimore, MD. CARON PITTER used the proceeds of the remote state \$6,396 deposit, a March 3, 2020 \$2,500 Zelle money transfer from ROHAN LYTTLE, JR., and a March 4, 2020, \$2,900 transfer from a Chase customer in Georgia, a total of \$12,096, to purchase Chase Money Orders totaling \$11,213 payable to a "Mr. Cooper" (\$2,213) and Insurance Auto Auction (\$9,000).

19. Your affiant and ISA Hartman recovered accountable mail activity and money transfer activity associated with 6310 Greenspring Avenue, Apartment 104, and identified incoming parcels sent by individuals since identified as V6 and V7. V6, age 70, told ISA Hartman that V6 was victimized in the amount of \$20,600 by an advance sweepstakes scam. V6 told ISA Hartman that two individuals, Jason Kennedy a reported representative of PCH, and David Saeger, the reported CEO of the California Lottery Commission, told V6 that V6 had won a \$5.5 million dollar prize. Kennedy and Saeger told V6 that V6 had to pre-pay taxes on V6's prize, and directed V6 to mail blank money orders, typically in denominations of \$1,000, to various agents throughout the

United States including Antonio Britt, 6310 Greenspring Avenue, Apartment 104, Baltimore, MD. V6 never received the promised cash prize. V7, age 81, mailed numerous envelopes, at least 18, addressed to 6310 Greenspring Avenue, Apartment 104, during the period January through September 2020. V7, a reported victim of Elder Financial Exploitation, also appears to be the victim of account takeover activity. Multiple attempts by banks, adult protective services, and law enforcement to curb V7's participation in this activity have been unsuccessful.

20. Your affiant and ISA Hartman recovered and reviewed Western Union and MoneyGram money transfer activity involving CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. On numerous occasions, PITTER, LYTTLE, and LYTTLE, JR. reported their residential address as 23216 130<sup>th</sup> Avenue, Laurelton, NY, the delivery address for one (1) V1 and four (4) V3 cash mailings. C.M., biological mother of ROHAN LYTTLE, JR., reported C.M.'s address as 185 Nassau Boulevard, West Hempstead, NY when C.M. received a Western Union money transfer. During June 2020, V1 completed two (2) cash mailings that were delivered to 185 Nassau Boulevard. During the period June 29, 2020 through August 9, 2020, C.M. sent seven (7) Zelle money transfers totaling \$9,830 payable to CARON PITTER. Since 2018, CARON PITTER sent 18 money transfers totaling \$6,190 to eight (8) different payees in Jamaica. On November 16, 2018, within an approximate one-hour period, CARON PITTER and ROHAN LYTTLE, JR. each sent \$1,000 money transfers to Jamaica. Since 2018, ROHAN LYTTLE, JR. has sent and received money transfers in both the United States and Jamaica.

**Evidence of additional suspect criminal activity**

21. On or about May 15, 2020, a Safeco Insurance (Liberty Mutual) settlement check in the amount of \$7,966.99 payable to T.D. was deposited to the Ro-Cars 75 Chase bank account. The check was addressed to T.D. at 23216 130<sup>th</sup> Avenue, Queens, NY. The check listed the Claim Number as 042302890. ISA Hartman reviewed Claim Number 042302890 with a Safeco Insurance Senior Special Investigator (SSI). The SSI told ISA Hartman, that the claimant, T.D., reported that a Safeco insured struck T.D.'s parked vehicle, a 2018 Toyota Tacoma pickup, VIN:3TMDZ5BNJM049601, in Queens, NY on

March 30, 2020. The SSI told ISA Hartman that the claim, which was not supported by a Police report, was suspect for a number of reasons to include the fact that:

- there was substantial apparent pre-accident damage to the vehicle,
- the vehicle was registered out of state to an entity, Work Hard Motors, as a salvage vehicle
- the vehicle only had nominal mileage, approximately 800 miles, since its July 2019 purchase by Work Hard Motors, eight (8) months prior to the accident.

The SSI told ISA Hartman that a Ro-Cars Auto Sales representative, identifying herself as "Karen", phonetic, contacted Safeco to submit a rental invoice associated with this claim. Ro-Cars submitted, and was paid, a claim totaling \$925.44 for a 17-day vehicle rental to T.D., for the reported 17-day period required to repair T.D.'s vehicle. Safeco mailed a \$925.44 check payable and addressed to Ro-Cars at 170-30 Douglas Avenue, Jamaica, NY on December 4, 2020. On January 5, 2021, the SSI spoke to "Karen" at Ro-Cars and requested verbally and via email a copy of T.D.'s driver's license and a signed copy of the rental car/loaner agreement. On the same day, January 5, 2021, from ro-cars@hotmail.com, the SSI received the following email: "I looked for the document we spoke about. But I cannot find a copy of the driver license or the signed paper due it was the height of the pandemic and secretary was working remotely. Ro-Cars, 170-30 Douglas Ave., Jamaica, NY 11433, Office: 718-657-0600"

22. Your affiant and ISA Hartman reviewed TD Bank business records for a bank account in the name Work Hard Motors. Our review disclosed that ROHAN LYTTLE and T.D. were Officers, Vice-President and President, respectively, and ROHAN LYTTLE was a Director of Work Hard Motors, a Delaware Corporation, effective July 2015. On June 4, 2020, ROHAN LYTTLE as CEO, and CARON PITTER, a co-signatory on the account, opened a bank account in the name Work Hard Motors at TD Bank. ROHAN LYTTLE was listed as the Primary Contact, and the business email address was listed as caron\_pit25@yahoo.com. ROHAN LYTTLE listed his residential address as 23216 130<sup>th</sup> Avenue, Laurelton, NY. As reported herein, CARON PITTER deposited \$21,830, cash, to the Work Hard Motors' TD Bank account on August 14, 2020.

23. Your affiant and ISA Hartman reviewed Chase business records for a bank account in the name Ro-Cars 75. Our review disclosed that on June 30, 2020, Ro-Cars received a \$65,000 incoming wire deposit from the Small Business Administration (SBA). An inquiry with the SBA revealed that the \$65,000 deposit represented the proceeds of a Paycheck Protection Program (PPP) loan. Your affiant and ISA Hartman recovered and reviewed Ro-Cars' Resolution to Borrow, PPP Borrower Application, PPP Settlement Sheet, and purported Employer's Quarterly Federal Tax Return. CARON PITTER, as 100% Owner, signed and submitted the PPP Application and signed the Settlement Sheet. CARON PITTER reported that Ro-Cars' average monthly payroll was \$26,000 and that Ro-Cars had eleven (11) employees. The Employer's Quarterly Tax Return for the period October through December 2019 reported eleven employees, wages totaling \$78,000, Federal Tax withheld of \$8,580, and Social Security and Medicare taxes due of \$11,934. The Employer's Quarterly Tx return was unsigned and undated. We reviewed Ro-Cars 75 Chase bank transactions for the relevant time period. Ro-Cars 75 bank transactions are not consistent with the representations contained on the PPL Application in terms of number of employees, payroll and taxes.

24. A Progressive Insurance Company Claims' Supervisor told ISA Hartman that he visited Ro-Cars at 170-30 Douglas Avenue on April 19, 2019 and was greeted by "Karen", phonetic. "Karen" reported that the owner, "Rohan", was elsewhere. The Claims Supervisor observed that no employees were present in the auto body shop. The Claims Supervisor reported that he later met with "Rohan" on April 23, 2019 and discussed the suspect claims history involving Ro-Cars.

25. Your affiant and ISA Hartman have reviewed thousands of known and admitted money laundering transactions associated with the proceeds of advance fee sweepstakes activity. The various transactions—cash, check, and money order mailings, Western Union, MoneyGram and Zelle money transfers and bank wires, attempted and completed—by V1 through V7, CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR., and others, in the United States and Jamaica detailed in this affidavit are consistent with knowing and willful fraud and money laundering activity.

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**SUMMARY**

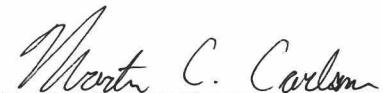
26. The mass marketing fraud losses and pattern of money transfer activity reported herein reflect CARON PITTER's, ROHAN LYTTLE's and ROHAN LYTTLE, JR.'s knowing and willful participation in mass marketing fraud and money laundering activity. For the reasons detailed herein, your Affiant has probable cause to believe that CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. received cash mailings and money transfers in a manner that furthered the scheme to defraud and maintained the anonymity of the fraudulent telemarketers. CARON PITTER, ROHAN LYTTLE and ROHAN LYTTLE, JR. completed financial transactions in a manner that concealed the nature, location, source, ownership or control of the fraudulent proceeds. Furthermore, CARON PITTER, ROHAN LYTTLE, and ROHAN LYTTLE, JR. conducted financial transactions with the proceeds of the fraudulent activity to promote the activity. CARON PITTER's, ROHAN LYTTLE's and ROHAN LYTTLE, JR.'s activity violated Title 18 United States Code Section 1349, Conspiracy to Commit Section 1341 Mail Fraud and Section 1343 Wire Fraud.



Nathan Berezansky  
US Postal Inspector

Sworn to and Subscribed Before Me

This 25<sup>th</sup> day of January 2021



NSB

1/25/2021  
2:45 PM

Martin C. Carlson  
United States Magistrate Judge